

## **9.0 DOCUMENTATION, RECORDKEEPING, AND REPORT REQUIREMENTS**

The keeping and maintenance of records is critical to providing the information necessary for managing and documenting facility operations and for reporting the progress of the remedial action to the public and regulatory agencies. Effective documentation and document management will improve operating personnel efficiency, reduce costs, lower risks, enhance strategic planning, and allow for the preparation of clear and concise reports. Clear, concise reports to the public and regulatory agencies will improve communications, prevent and/or reduce problems, and provide for the development of an honest and trusting relationship among all parties that may lead to reduced remedial action costs and duration.

This section provides an overview of recordkeeping and reporting requirements for the facility and references appropriate other sections of this plan and other reports that contain more detailed requirements. Documentation and recordkeeping must be accomplished for the following activities:

- Facility daily operations
- Facility operating parameters
- Aquifer management
- Sampling and analysis (see Section 8.0, quality assurance project plan; Appendix F, field sampling plan)
- Facility maintenance and repair (see Section 10.0)
- Safety (see Section 11.0)
- Spill response (see Section 11.0)
- Environmental regulatory compliance (see Appendix A)
  - Dangerous waste management
  - Solid waste management
  - Chemical inventory management
  - Hazard communication
- Remedial action operation and maintenance cost projection.

## **9.1 RECORDS HANDLING**

Records for these activities should be neatly labeled and organized, promptly filed, and kept at the facility. As appropriate, important records should be copied and stored offsite to prevent their loss in the event of a disaster at the facility. Originals should be retained at the facility.

## **9.2 RECORDS RETENTION**

Records must be retained for varying periods of time based on the requirements of the applicable governing regulations. In general, facility operating records must be retained for a minimum of 2 to 5 years, and records related to personnel training, chemical exposures, and medical monitoring must be retained for a minimum of 2 to 5 years following termination of employment for a worker. The regulatory requirements establish minimum record retention periods; however, it is recommended that all nontrivial records be retained for the duration of the remedial action. Records retained beyond the minimum required retention period may be stored offsite in a safe location.

Reporting requirements to regulatory agencies vary with the requirements of the governing regulations. Required reports are summarized in Table 9-1.

## **9.3 DOCUMENTATION AUDITS**

Management may and should conduct periodic operations audits of facility operations that include reviews of documentation and recordkeeping practices. These audits should conclude with a written audit report detailing items/areas of deficiency and should identify corrective actions to be implemented by facility personnel. Facility records are also subject to inspection by regulatory agency personnel and, therefore, should not be removed from the facility except for brief periods as necessary for copying.

## **9.4 FACILITY DAILY OPERATIONS**

The facility operator is responsible for keeping a logbook of activities at the facility. An entry in the logbook should be made each time the facility operator visits the site. Information to be recorded includes:

- Facility operating status
- Times and reasons for changes to facility operating status

- Values of key operating parameters
- Major maintenance/report activities
- Problems encountered/solved
- Work by outside vendors/maintenance staff
- Checks of facility components/status
- Health and safety related information
- Chemical/waste shipments and/or deliveries
- Interactions with public, regulatory agencies, visitors, or other parties
- Unusual/suspect information, conditions, or operation of facility equipment or instruments.

A sample daily operations log entry is shown on Figure 9-1.

The facility operator is also responsible for maintaining a sign-in log for visitors. A sample visitor's sign-in log is shown in Table 9-2.

Date 5/6/94, Friday/0815-0500

Operator S.G. Anderson

Weather Cloudy, ~50°F, light rain

- Plant flow @ 980 gpm, all 10 wells operating
- Joe Boyd from SC Utilities Department Maintenance arrived to work on electrical problem with pump P25-2
- Inspected scale control coupon for scale, very light film present
- High water level alarm in well vault CP-E3; check vault, no water present, cleaned sump and sensor, alarm condition cleared
- Joe Boyd said pump problems due to loose connection at pump disconnect switch, which he fixed. Tested pump, works fine.
- Completed general housekeeping
- Verified scale control level in tank T-1 with dip stick
- Received analytical results from CAS for 4/25/94 sampling event. All effluent NPDES limits achieved.
- Scheduled next delivery of scale control chemical with ABC Chemical Co. for 5/25/94 (1,000 gallons)
- Reviewed plant status @ ICM computer, no problems apparent
- Left site @ 0500.



**TABLE 9-1**  
**REQUIRED REPORTS**

<b>Report</b>	<b>Person Responsible for Preparation</b>	<b>Date Due</b>	<b>Recipient<sup>(a)</sup></b>
Remedial action progress report	Project manager	Quarterly	Ecology, EPA
Effluent compliance report	Facility operator <sup>(b)</sup>	Quarterly	Ecology, EPA
Form 4, generator annual <sup>(c)</sup> dangerous waste report	Facility operator <sup>(b)</sup>	March 1	Ecology
Tier 1 emergency and hazardous <sup>(d)</sup> chemical inventory report	Facility operator <sup>(b)</sup>	July 1	Ecology
Facility operation and maintenance status and cost report	Facility operator/ project manager		Manager, Spokane County Utilities Department

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- (a) Ecology = Washington State Department of Ecology  
EPA = U.S. Environmental Protection Agency.
- (b) All reports must be approved by project manager.
- (c) Form 4 report will be required only if Dangerous Waste as defined in WAC 173-303 is disposed from the facility in the previous year (see Appendix A)
- (d) Tier 1 report will be required only if at any one time in the previous year 10,000 or more pounds of a hazardous chemical was stored on site (see Appendix A).

**TABLE 9-2**

**VISITOR SIGN-IN LOG  
COLBERT LANDFILL REMEDIAL ACTION PROJECT,  
AIR STRIPPING TREATMENT FACILITY  
SPOKANE COUNTY UTILITIES DEPARTMENT**

<b>Date</b>	<b>Time In</b>	<b>Time Out</b>	<b>Name</b>	<b>Company</b>	<b>Purpose of Visit</b>